## UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

ANTHONY BAYAD,	
Plaintiff,	) ) CIVIL ACTION NO. 04-10468-GAIC
<b>v.</b>	)
JOHN CHAMBERS, PATRICIA RUSSO, ANTHONY SAVASTANO, and CARL WIESE,	) ) )
Defendants.	) ) _)

## **DECLARATION OF CARL WIESE**

- I, CARL WIESE, declare under the pains and penalties of perjury, pursuant to 28 U.S C § 1746, the following:
- 1. I am the Area Vice President for Advanced Technology with Cisco Systems, Inc ("Cisco"). I have worked at Cisco at its Edison, New Jersey facility since August 27, 2002.
- 2. I submit this declaration in support of the Motion for Summary Judgment of myself, John Chambers and Anthony Savastano in connection with the captioned matter.
- 3. I had no involvement with and have no personal knowledge of the facts surrounding Anthony Bayad's employment with Cisco. I was not aware that Mr. Bayad had worked at Cisco until after he filed this lawsuit in 2004.
- 4. As I understand Mr. Bayad's allegations, Cisco terminated his employment in May 2001, more than a year before I began work at Cisco.

- 5. Although I knew Mr. Bayad when we both worked at Lucent in 1997, I did not interact in any way with Mr. Bayad during the period of his employment with Cisco or at any time thereafter.
- 6. I have no personal knowledge concerning, and have had no involvement with, at y decision regarding Mr. Bayad's employment with Cisco, the termination of his employment, or Mr. Bayad's alleged subsequent attempts to obtain re-employment with Cisco or employment elsewhere.
- 7. I have no involvement with the administering or scoring of Cisco Certified Internetworking Engineer ("CCIE") certifications.
- 8. To my knowledge, Cisco does not maintain a no-hire list targeting minorities as alleged by Mr. Bayad.
- 9. I have no personal knowledge concerning, and have had no involvement with, an ' decision regarding Mr. Bayad's alleged attempts to foster any type of business relationship with Cisco or any other entity, on behalf of himself or any affiliated entity.
- 10. I have never communicated with John Chambers about Mr. Bayad. Since 1997, 1 have had no communications with Anthony Savastano about Mr. Bayad.

February 15, 2005

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